UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) 	
V.)	CRIM. NO. 21-CR-10350-LTS
ELI SANDERS)	

ELI SANDERS' SUPPLEMENT TO GOVERNMENT'S THIRD INTERIM STATUS CONFERENCE REPORT (DOC. 158)

Defendant Eli Sanders hereby supplements the Government's Third Interim Status Conference Report (Doc. 158) and assigns as reasons therefor the following:

- 1. The Defendant notes that he was not consulted about the preparation of the Government's Third Interim Status Conference Report and he was not informed of its creation until he saw it filed as Doc. 158. For these reasons, he supplements the report to add in what he would have requested the Government to have reported to the Court in Doc. 158, had he been contacted by the Government.
- 2. From May 5, 2022 to June 24, 2022, when conversations reached a stalemate, the Government and Defendant have been wrangling and disagreeing about the quantity of drug to be attributed to the defendant.

- 3. Despite Eli Sanders' specific request for discovery pursuant to his 116 discovery letter, the Government has refused to name a specific quantity of methamphetamine to be attributed to him.
- 4. Despite the absence of this crucial information critical to a defendant's decision whether or not to plead guilty or to proceed to trial presently scheduled for December 12, 2022, Eli Sanders has sought to obtain from the United States Probation office its calculation as to the defendant's criminal history category and is awaiting its report.
- 5. Eli Sanders believes that in fairness and in law, the Government is presently obligated to give to the defendant its best estimated calculation as to the specific quantity of drug to be attributed to Eli Sanders and moreover notes that such information would be required to be given to any probation officer for presentation in a pre-sentence report to the Court.

WHEREFORE, for the foregoing reasons, Defendant Eli Sanders respectfully requests that this Court GRANT the within motion.

Defendant Eli Sanders By his Attorney,

/s/ James B. Krasnoo

James B. Krasnoo (Bar No. 279300) Krasnoo, Klehm & Falkner LLP 28 Andover Street, Suite 240 Andover, MA 01810 (978) 475-9955 (telephone) (978) 337-2998 (mobile) (978) 474-9005 (facsimile) Dated: July 17, 2022 jkrasnoo@kkf-attorneys.com

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the within document upon the attorney of record for each other party via the Court's ecf system on July 17, 2022.

/s/ James B Krasnoo James B. Krasnoo